

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

THEODORE HAROLD EDWARD
BOBO, JR.,
a/k/a Boo,

Defendant.

INDICTMENT

18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(2)
18 U.S.C. § 924(c)(1)(A)
18 U.S.C. § 924(d)(1)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 853
28 U.S.C. § 2461(c)

THE UNITED STATES GRAND JURY CHARGES THAT:

INTRODUCTION

At times relevant to this Indictment:

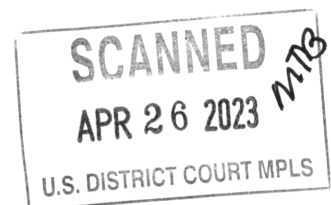
Defendant THEODORE HAROLD EDWARD BOBO, JR., a.k.a. "Boo,"
resided in the State and District of Minnesota.

The Defendant was a member and associate of a criminal organization,
namely, the Minneapolis Bloods street gang (hereinafter, the "Bloods"). At
times relevant to this Indictment, the Bloods operated in the District of
Minnesota, and elsewhere.

COUNT 1

(Possession with Intent To Distribute Cocaine)

On or about August 31, 2021, in the State and District of Minnesota, the
defendant,



**THEODORE HAROLD EDWARD BOBO, JR.,
a/k/a Boo,**

did knowingly and intentionally possess with intent to distribute less than 500 grams of a mixture and substance containing a detectable amount of cocaine, a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B).

COUNT 2
(Felon in Possession of a Firearm)

On or about August 31, 2021, in the State and District of Minnesota, the defendant,

**THEODORE HAROLD EDWARD BOBO, JR.,
a/k/a Boo,**

having previously been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year:

Offense	Place of Conviction	Date of Conviction (On or About)
Possess Pistol/Assault Weapon by Ineligible Person	Hennepin County, MN	February 9, 2004
Assault-3rd Degree-Substantial Bodily Harm	Hennepin County, MN	September 30, 2010
Possess Pistol/Assault Weapon by Ineligible Person	Hennepin County, MN	March 4, 2011
Drugs - 5th Degree – Possession	Hennepin County, MN	September 11, 2019

and knowing he had been convicted of at least one crime punishable by

imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is, a Beretta, model APX, 9mm semi-automatic pistol, bearing serial number A125641X, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 3

(Felon in Possession of a Firearm)

On or about August 31, 2021, in the State and District of Minnesota, the defendant,

**THEODORE HAROLD EDWARD BOBO, JR.,
a/k/a Boo,**

having previously been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year:

Offense	Place of Conviction	Date of Conviction (On or About)
Possess Pistol/Assault Weapon by Ineligible Person	Hennepin County, MN	February 9, 2004
Assault-3rd Degree-Substantial Bodily Harm	Hennepin County, MN	September 30, 2010
Possess Pistol/Assault Weapon by Ineligible Person	Hennepin County, MN	March 4, 2011
Drugs - 5th Degree – Possession	Hennepin County, MN	September 11, 2019

and knowing he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is, a Smith and

Wesson, model 19-4, .357 caliber revolver, bearing serial number 48K2078, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 4

(Possession of a Firearm In Furtherance of Drug Trafficking)

On or about August 31, 2021, in the State and District of Minnesota, the defendant,

**THEODORE HAROLD EDWARD BOBO, JR.,
a/k/a Boo,**

did knowingly possess a firearm, that is, a Beretta, model APX, 9mm semi-automatic pistol, bearing serial number A125641X, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine, as charged in Count 1 of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A).

FORFEITURE ALLEGATIONS

Upon conviction of Count 1 of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds the defendant obtained directly or indirectly as a result of said violations, and any and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violations,

including but not limited to a Beretta, model APX, 9mm semi-automatic pistol, bearing serial number A125641X, and any ammunition seized therewith.

Upon conviction of Count 2, Count 3, and Count 4 of this Indictment, the defendant shall forfeit to the United States any and all firearms, accessories, and ammunition involved in or used in connection with said count of conviction, including but not limited to a Beretta, model APX, 9mm semi-automatic pistol, bearing serial number A125641X, and a Smith and Wesson, model 19-4, .357-caliber revolver, bearing serial number 48K2078, and any ammunition seized therewith, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON